IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

SANTOS RODRIGUEZ, JR.,	§	
MARIA DE JESUS OLVERA,	§	
JESSICA MUNOZ, AND	§	
JESUS ANDRES MUNOZ	§	
Plaintiffs,	§	CIVIL ACTION NO. 7:14-CV-67
	§	
V.	§	
GUADALUPE "LUPE" TREVIÑO,	§	
SHEFIFF OF HIDALGO COUNTY, TEXAS,	§	
HIDALGO COUNTY, TEXAS AND CITY	§	
OF MISSION, TEXAS	§	
Defendants.	§	

PLAINTIFFS', SANTOS RODRIGUEZ, JR., MARIA DE JESUS OLVERA, JESSICA MUNOZ, AND JESUS ANDRES MUNOZ INITIAL DISCLOSURE

COMES NOW Plaintiffs', SANTOS RODRIGUEZ, JR., MARIA DE JESUS OLVERA, JESSICA MUNOZ, AND JESUS ANDRES MUNOZ, and files these initial disclosures, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

A. Individuals likely to have discoverable information

Maria De Jesus Olvera, Plaintiff

Jessica Munoz, Plaintiff

Jesus Andres Munoz, Plaintiff

Plaintiffs' Attorneys of Record David L. Flores Tony Torres Flores & Torres, L.L.C. 118 E. Cano Edinburg, Texas 78539

County of Hidalgo, Defendant 2818 South Business Highway 281 Edinburg, Texas 78539

Sheriff Guadalupe "Lupe" Trevino, Defendant 711 El Cibolo Road Edinburg, Texas 78541 Hidalgo County Sheriff's Office, Defendant 711 El Cibolo Road Edinburg, Texas 78541

Preston Henrichson

Law offices of Preston Henrichson, P.C.

Edinburg, Texas 78539 Marissa Carranza Hernandez MACH Attorney at Law 205 E. Mahl Edinburg, Texas 78539

Attorneys for Hidalgo County Sheriff's Office, Sheriff Guadalupe "Lupe" Trevino, and County of Hidalgo, Texas.

Chief of Police, Martin Garza, Defendant City of Mission 1200 E. 8th Street Mission, Texas 78572

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Guerra, Leeds, Sabo & Hernandez, P.L.L.C.

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Attorneys for Defendants, City of Mission, Texas and Martin Garza, Chief of Police

Officer, Jonathan Christopher Trevino City of Mission Police Department 1200 E. 8th Street Mission, Texas 78572

Deputy Gerardo Mendoza Duran Hidalgo County Sheriff's Department 711 El Cibolo Road Edinburg, Texas 78541 5508 Belize Lane Las Milpas, Texas 78577

C. Description of documents relevant to disputed facts

Any and all incident/investigative reports and/or files made by Defendants' pertaining to Plaintiffs' and others investigated/arrested by the Panama Unit. Documents pertaining to the policies and procedures prepared by or on behalf of Defendants'. Other records pertaining to investigation practices of defendants'. Correspondence between defendants'.

D. Computation of Damages

Plaintiffs' will supplement

E. Insurance agreement

None

F. Disclosure of experts

With respect to testifying expert witnesses, Plaintiff has none at this time.

Plaintiff is making their initial disclosures based on the information reasonably available to them at this point in time, in accordance with Rule 26(a) (1). As additional information becomes available to Plaintiff this disclosures will be supplemented in accordance with the Federal Rules of Civil Procedure.

SIGNED on this 23d day of May, 2014.

Respectfully submitted,

LAW OFFICE OF FLORES & TORRES

118 East Cano Street Edinburg, Texas 78539 (956) 287-9191 (956) 287-9190 (fax)

By: /s/ DAVID L. FLORES

David L. Flores State Bar No.: 24040909 USDC No. 5041 Eduardo A. Torres State Bar No. 24051438 USDC No. 665023

Attorney for Plaintiffs'

CERTIFICATE OF SERVICE

I hereby certify that on the ______day of May, 2014, a true and correct copy of the foregoing instrument has been served on counsel of record listed as listed below:

VIA FACSIMILE: (956) 541-1893

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By: /s/David L. Flores